

previously, Applicant believes that Williams, itself, does not qualify as prior art, though it claims priority to earlier applications.

Regardless, claim 8, as amended in the previous Office Action, is directed to an apparatus including, *inter alia*, at least two pairs of opposed mounting members, wherein at least one member of each pair is reciprocally displaceable toward the other member and biased via a first bias away from the second member. Additionally, a mechanism is configured to selectively apply a second bias to each biased member to counteract the first bias and displace the biased member toward the other member of the pair. A stencil with at least four apertured peripheral edges is also provided for mounting on the mounting members, which tension the stencil along two axes.

Williams describes a mounting apparatus employing a pair of mounting members that apply tension along one axis of a stencil with apertures along two peripheral edges. Williams neither teaches nor suggests the use of at least two pairs of opposed mounting members for supplying tension along two axes or the use of a stencil having apertures along at least four peripheral edges for mounting on the mounting members.

Krueger describes a mounting apparatus for mounting a very different type of stencil. Specifically, the stencil comprises mesh screening that is stretched by the mounting apparatus. Krueger describes mounting members for supplying tension along two axes. However, the mounting members are not biased away from each other, and no mechanism is disclosed for applying a second bias to counteract the first bias.

Because the teachings of Krueger are directed to apparatus for mounting a mesh stencil, which can be readily stretched and tensioned, there is no motivation or suggestion of combining its teachings with those of Williams, which describes apparatus for mounting a stencil formed of sheet steel. Further still, there is no teaching or suggestion as to how the teachings of the two references could be combined to produce an apparatus with mechanisms for providing counteracting biases and for providing resultant tension along two axes of the stencil or of the desirability of doing so. Moreover, none of the other references of record in this application remedy these deficiencies in the teachings of Krueger and Williams.

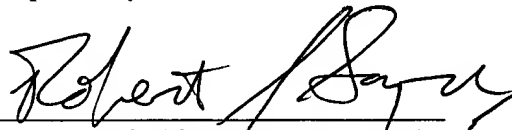
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Because the prior art fails to teach or suggest an apparatus having all of the limitations of claim 8, as amended on July 9, 2001, Applicant respectfully submits that claim 8 meets the requirements of novelty and non-obviousness under 35 U.S.C. §§102 and 103.

### CONCLUSION

On the basis of the foregoing arguments in addition to those offered in the Amendment and Response filed on July 9, 2001, Applicant respectfully submits that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact either of the undersigned at the telephone number provided below.

Respectfully submitted,



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